



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEJANDRO SOTO,
AUSTIN BLACANO,
JOHN CARTIER,
CHRISTIAN MCKIBBEN, and
CRAIG RUSHTON,

Defendants.

CR No. 2:24-cr-00284-DMG

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to
Distribute Fentanyl and Cocaine;
21 U.S.C. §§ 841(a)(1), (b)(1)(C):
Distribution of Controlled
Substances]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. The "Tor network," often referred to as simply "Tor," was a network of computers on the Internet, distributed around the world, that was designed to conceal the true Internet Protocol ("IP") addresses of the computers accessing the network, and, thereby, the

1 locations and identities of the network's users. Web addresses on
2 Tor could only be accessed through specific web browser software,
3 including a major dark-web browser known as "Tor Browser," designed
4 to access the Tor network.

5 2. "Darknet markets," also called dark web marketplaces, refer
6 to extensive, sophisticated, and widely used criminal marketplaces
7 operating on the Tor network, which allowed participants to buy and
8 sell illegal items, such as drugs, firearms, and other hazardous
9 materials with greater anonymity than was possible on the traditional
10 Internet. Buyers purchased illegal narcotics and contraband from
11 darknet markets using digital currency, such as Bitcoin and Monero, a
12 cryptocurrency that anonymized transaction information.

13 3. White House Market, ToRReZ, Dark0de, AlphaBay, and Versus
14 Market were, at various times, popular darknet markets widely used by
15 individuals in the United States and elsewhere to buy and sell
16 narcotics and other contraband.

17 4. Vendors and buyers on the White House Market, ToRReZ,
18 Dark0de, AlphaBay, and Versus Market markets operated under anonymous
19 monikers. However, similar to traditional e-commerce websites that
20 offer legitimate goods for sale, vendors on the darknet markets
21 received ratings from buyers based on, among other things, the
22 purported quality of the narcotics sold, reliability of delivery, and
23 whether the vendor was responsive to questions about the contraband
24 being sold.

25 5. Vendors on darknet markets concealed their communications
26 with buyers through an encryption system known as "Pretty Good
27 Privacy," or simply PGP encryption. Secure communication using PGP
28 encryption required the use of what is known as a "public key," which

1 is a string of alphanumeric characters that enabled a user to receive
2 encrypted messages from others. Since public keys were associated
3 with specific anonymous monikers, vendors on darknet marketplaces
4 listed their public keys in listings for illegal narcotics and
5 contraband so that buyers could communicate directly with the vendor.

6 6. It was common for drug vendors on darknet markets to sell
7 counterfeit oxycodone pills, often referred to as "M30s" or "blues,"
8 that would contain fentanyl or other synthetic opioids.

9 B. OBJECTS OF THE CONSPIRACY

10 Beginning on a date unknown to the Grand Jury, and continuing
11 until on or about May 3, 2023, in Los Angeles County, within the
12 Central District of California, and elsewhere, defendants ALEJANDRO
13 SOTO, AUSTIN BLACANO, JOHN CARTIER, CHRISTIAN MCKIBBEN, and CRAIG
14 RUSHTON conspired with Brian McDonald, Ciara Clutario, Sebastian
15 Rodriguez, and others known and unknown to the Grand Jury, to commit
16 offenses against the United States, namely, to knowingly and
17 intentionally distribute (i) at least 400 grams of a mixture and
18 substance containing a detectable amount of N-phenyl-N-[1-(2-
19 phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II
20 narcotic drug controlled substance, in violation of Title 21, United
21 States Code, Sections 841(a)(1), (b)(1)(A)(vi), and (ii) cocaine, in
22 violation of Title 21, United States Code, Sections 841(a)(1),
23 (b)(1)(C).

24 C. MANNER AND MEANS OF THE CONSPIRACY

25 The objects of the conspiracy were to be accomplished, in
26 substance, as follows:

27 1. Co-Conspirator McDonald would create vendor profiles on
28 darknet marketplaces, including White House Market, ToRReZ, Dark0de,

1 AlphaBay, and Versus Market marketplaces, to sell fentanyl, cocaine,
2 and other illegal drugs in exchange for Monero cryptocurrency, using
3 the vendor names "SOUTHSIDEOXY," "REALSOUTHSIDEOXY,"
4 "JEFEDEMICHOCAN," "FIREUSA," and others.

5 2. Co-Conspirators McDonald and Clutario would monitor and
6 maintain the darknet vendor profiles, including by updating drug
7 listings and shipment options, tracking drug orders received through
8 the profiles, and offloading Monero cryptocurrency received on the
9 darknet marketplaces into cryptocurrency wallets that the co-
10 conspirators controlled.

11 3. Co-Conspirators McDonald and Rodriguez would recruit and
12 hire co-conspirators to assist with packaging and shipping the
13 narcotics that the defendants sold on darknet marketplaces.

14 4. Co-Conspirator McDonald, both individually and through Co-
15 Conspirator Rodriguez, would direct co-conspirators, including
16 defendants SOTO, BLACANO, CARTIER, MCKIBBEN, and RUSHTON, regarding
17 the packaging and shipping of the narcotics that the defendants sold
18 on darknet marketplaces.

19 5. Each of the defendants would package drugs sold on darknet
20 marketplaces, including at defendant MCKIBBEN and defendant RUSHTON's
21 residence, 1000 N. Kenneth Road, in Burbank, California, and then
22 ship those parcels containing the drugs to drug consumers.

23 6. Co-Conspirators McDonald and Clutario would store proceeds
24 from the drug sales at their respective residences.

25 7. Through this conspiracy, the defendants sold and shipped
26 hundreds of thousands of dollars' worth of narcotics, including
27 fentanyl and cocaine, to drug purchasers across the United States.

1 D. OVERT ACTS

2 On or about the following dates, in furtherance of the
3 conspiracy and to accomplish its objects, defendants SOTO, BLACANO,
4 CARTIER, MCKIBBEN, and RUSHTON, Co-Conspirators McDonald, Clutario,
5 and Rodriguez, and others known and unknown to the Grand Jury,
6 committed various overt acts within the Central District of
7 California, and elsewhere, including, but not limited to, the
8 following:

9 Overt Act No. 1: On April 30, 2021, Co-Conspirator McDonald
10 sent text messages to Co-Conspirator Rodriguez stating that he had
11 "signed up from the market" and memorializing that he and Co-
12 Conspirator Rodriguez were "gonna do it together."

13 Overt Act No. 2: On April 30, 2021, in response to a text
14 message from Co-Conspirator McDonald stating that he was
15 manufacturing narcotics in the state of Kentucky, Co-Conspirator
16 Rodriguez responded, "my boy ur walter white from breaking bad now or
17 something."

18 Overt Act No. 3: On April 30, 2021, in text messages, Co-
19 Conspirators Clutario and McDonald exchanged information to allow Co-
20 Conspirator Clutario to access a vendor profile on the darknet
21 marketplace, White House Market.

22 Overt Act No. 4: On May 7, 2021, in text messages to Co-
23 Conspirator Rodriguez, Co-Conspirator McDonald discussed profits of
24 the drug trafficking operation, stating that Co-Conspirator McDonald
25 made "damn near 5k on the market" in the first week of operating.

26 Overt Act No. 5: On May 7, 2021, in text messages to Co-
27 Conspirator Clutario, Co-Conspirator McDonald indicated their darknet
28

1 drug sales were "flourish[ing]" and that a drug customer just placed
2 a large order for "3k pieces."

3 Overt Act No. 6: On May 15, 2021, at Co-Conspirator
4 McDonald's direction, Co-Conspirator Rodriguez mailed a shipment
5 containing drugs to a drug customer.

6 Overt Act No. 7: On May 15, 2021, in text messages, Co-
7 Conspirator McDonald instructed Co-Conspirator Clutario to create
8 labels for 20 drug parcels, to which Co-Conspirator Clutario
9 responded, "i'll be on the way at like 5."

10 Overt Act No. 8: On May 16, 2021, in response to a text
11 message from Co-Conspirator Rodriguez asking "25 packages tomorrow?",
12 Co-Conspirator McDonald responded that the number of drug parcels
13 would "probs [] be 35-40 by Monday" and stated he would pay Co-
14 Conspirator Rodriguez "2-3 hunnid."

15 Overt Act No. 9: On May 16, 2021, in text messages, Co-
16 Conspirator McDonald told Co-Conspirator Rodriguez he had just sold
17 "2 yatches" -- or 20,000 pills -- and indicated that the co-
18 conspirators "got like 42000" in available drug proceeds.

19 Overt Act No. 10: On May 27, 2021, in text messages, Co-
20 Conspirator Rodriguez sent Co-Conspirator McDonald photographs of
21 USPS boxes, and advised Co-Conspirator McDonald that he had "grabbed
22 every type of box and package."

23 Overt Act No. 11: On May 30, 2021, in text messages to Co-
24 Conspirator Clutario, Co-Conspirator McDonald stated "I got 10k
25 confirmed orders on the market."

26 Overt Act No. 12: On June 6, 2021, in text messages, Co-
27 Conspirator Clutario and Co-Conspirator McDonald exchanged messages
28

1 and a passcode to withdrawn drug proceeds from the dark web
2 marketplace, White House Market.

3 Overt Act No. 13: On June 11, 2021, in text messages to Co-
4 Conspirator Clutario, Co-Conspirator McDonald stated he was "packing"
5 drug parcels and was "gonna drop em off" at the post office.

6 Overt Act No. 14: On June 21, 2021, in response to a text
7 message from Co-Conspirator McDonald stating that he had 34 drug
8 orders to fulfill, Co-Conspirator Rodriguez asked, "do you have
9 enough packages[?]" and stated "i'm coming rn."

10 Overt Act No. 15: On June 26, 2021, in response to defendant
11 BLACANO asking Co-Conspirator McDonald "you think I can deliver or
12 help out?", Co-Conspirator McDonald directed defendant BLACANO to
13 "bring boxes if u want & u can drop them off" and stated that Co-
14 Conspirator McDonald would pay defendant BLACANO "half of what i
15 regularly give." Co-Conspirator McDonald further advised defendant
16 BLACANO that he would be able to provide defendant BLACANO with work
17 packaging and shipping drug orders on "Monday," "tuesday," "friday,"
18 "& sat" of that week.

19 Overt Act No. 16: On July 2, 2021, in text messages, Co-
20 Conspirator McDonald and Co-Conspirator Clutario discussed accessing
21 a dark web marketplace to review and process drug orders.

22 Overt Act No. 17: On July 8, 2021, in text messages to
23 defendant BLACANO, Co-Conspirator McDonald instructed "lmk when the
24 packs out" and stated "shi shoulda been done bro" because "im paying
25 u almost 6k a month bro."

26 Overt Act No. 18: On July 13, 2021, in text messages, Co-
27 Conspirator McDonald instructed Co-Conspirator Rodriguez to retrieve
28 Co-Conspirator McDonald's keys, to use those keys to access Co-

1 Conspirator McDonald's apartment and fulfill drug orders, and to use
2 the "good pills" to fulfill the drug orders, of which Co-Conspirator
3 McDonald stated there should be 10,000.

4 Overt Act No. 19: On July 17, 2021, in text messages to Co-
5 Conspirator Clutario, Co-Conspirator McDonald stated "i got another
6 20k" and indicated he would spend \$35,000 to purchase additional
7 drugs to sell on the dark web.

8 Overt Act No. 20: On July 23, 2021, Co-Conspirator McDonald
9 provided an update to Co-Conspirator Rodriguez on the drug
10 trafficking operation in which he stated, via text message, that,
11 over the course of the "last 30 days," the operation had generated
12 \$297,000 in revenue, and produced a "profit" of \$160,000.

13 Overt Act No. 21: On July 24, 2021, in text messages, Co-
14 Conspirator McDonald asked Co-Conspirator Clutario if she could "make
15 the labels on [her] pc" for seven drug orders he was "sending today,"
16 and further instructed Co-Conspirator Clutario to download the
17 Telegram encrypted messaging application.

18 Overt Act No. 22: On July 26, 2021, in text messages to Co-
19 Conspirator Clutario about the goals of the drug trafficking
20 operation, Co-Conspirator McDonald stated "i'm really tryna make like
21 5 mil" "and disappear."

22 Overt Act No. 23: On July 30, 2021, in encrypted messages sent
23 through Telegram Messenger, Co-Conspirator McDonald informed Co-
24 Conspirator Rodriguez, defendant SOTO, and defendant BLACANO that
25 "[t]omorrow there is 30 orders," that "[a]ll orders need to be
26 packaged & labeled by 3pm," that "[a]ll packs should be in the mail
27 by 5 pm" and that "[y]ou guys need to BE HERE at 10 AM SHARP." Co-
28

1 Conspirator McDonald then added "this is a real life job" and "sebas
2 [i.e., Co-Conspirator Rodriguez] is the boss when I am [] gone."

3 Overt Act No. 24: On July 31, 2021, Co-Conspirator McDonald
4 informed Co-Conspirator Rodriguez, via text message, that "as my
5 right hand you'll get 10k a month," and further referred to these
6 forthcoming payments as Co-Conspirator Rodriguez's "paycheck."

7 Overt Act No. 25: On August 9, 2021, Co-Conspirator Rodriguez
8 sent multiple updates via text message to Co-Conspirator McDonald on
9 his work processing "so many orders."

10 Overt Act No. 26: On August 10, 2021, in text messages, Co-
11 Conspirator McDonald told Co-Conspirator Clutario, "i need u to come"
12 because "there's literally 35 new [orders]."

13 Overt Act No. 27: On August 14, 2021, in text messages to Co-
14 Conspirator Clutario, Co-Conspirator McDonald stated that he had
15 "spent 100k on work this week," which Co-Conspirator McDonald further
16 noted would generate "so much" for the drug trafficking operation.

17 Overt Act No. 28: On August 17, 2021, Co-Conspirator McDonald
18 sold "Oxy M30 50 Pack" and "96% Pure Coke 7g" on the White House
19 Market marketplace, through the vendor page SOUTHSIDEOXY, and
20 subsequently distributed approximately 50 pills containing fentanyl,
21 and approximately 7 grams of cocaine, to a person whom Co-Conspirator
22 McDonald believed was a drug buyer, but who was actually an
23 undercover employee of the Drug Enforcement Administration ("DEA").

24 Overt Act No. 29: On August 18, 2021, in encrypted messages
25 sent through Telegram Messenger, Co-Conspirator Rodriguez told
26 defendant SOTO "we are behind," "yesterday's shit barely went out,"
27 and "now more orders need to go out," to which defendant SOTO
28 responded "every order will go out today i promise."

1 Overt Act No. 30: On August 22, 2021, in encrypted messages
2 sent through Telegram Messenger, Co-Conspirator McDonald instructed
3 Co-Conspirator Rodriguez, defendant SOTO, and defendant BLACANO that
4 "packing needs to start as soon as possible" for "25 orders today,"
5 to which defendant SOTO responded "seba [i.e., Co-Conspirator
6 Rodriguez] and i are packing tomorrow."

7 Overt Act No. 31: On August 25, 2021, in an encrypted message
8 sent through Telegram Messenger, defendant MCKIBBEN informed Co-
9 Conspirator Rodriguez that he had "[j]ust made a bunch of bags sotos
10 about to slide and we will start packing up the sugar," to which Co-
11 Conspirator Rodriguez responded "okay perfect."

12 Overt Act No. 32: On August 26, 2021, in text messages to Co-
13 Conspirator Clutario, Co-Conspirator McDonald asked "are u gonna do
14 the labels[?]," to which Co-Conspirator Clutario responded "okay send
15 to me" and, later confirmed "done."

16 Overt Act No. 33: On August 30, 2021, in encrypted messages
17 sent through Telegram Messenger, defendant MCKIBBEN asked Co-
18 Conspirator Rodriguez if there was a "list." Co-Conspirator
19 Rodriguez responded with a photograph of a handwritten list of 52
20 drug orders for cocaine and M30 pills.

21 Overt Act No. 34: On August 30, 2021, in response to defendant
22 BLACANO informing Co-Conspirator Rodriguez that "Christian [i.e.,
23 defendant MCKIBBEN] did all the blues," Co-Conspirator Rodriguez
24 instructed defendant BLACANO to "weigh out coke."

25 Overt Act No. 35: On August 31, 2021, in text messages to Co-
26 Conspirator Clutario, Co-Conspirator McDonald stated "please make
27 sure you keep track of the \$" and noted that he wanted her "to have
28 250k" saved.

1 Overt Act No. 36: On September 4, 2021, in encrypted messages
2 sent through Telegram Messenger, defendant MCKIBBEN informed Co-
3 Conspirator Rodriguez that he "[j]ust got done with all the coke,"
4 and that "Craig [i.e., defendant RUSHTON] [was] finishing up with the
5 percs." Later that day, defendant MCKIBBEN sent a further update to
6 Co-Conspirator Rodriguez that they had not "label[ed]" the shipments,
7 but that they had "put[] the work in Manillas."

8 Overt Act No. 37: On September 5, 2021, in an encrypted
9 message sent through Telegram Messenger, defendant RUSHTON told Co-
10 Conspirator Rodriguez, "we finished everything and it's in manila's
11 we doing boxes now."

12 Overt Act No. 38: On September 5, 2021, in response to the
13 text message referenced in Overt Act No. 37, Co-Conspirator Rodriguez
14 asked "how it take so long[?]," to which defendant RUSHTON replied,
15 "there was hella orders."

16 Overt Act No. 39: On September 7, 2021, in encrypted messages
17 sent through Telegram Messenger, Co-Conspirator Rodriguez asked
18 defendant MCKIBBEN "can u work today," to which defendant MCKIBBEN
19 responded "[y]up." Co-Conspirator Rodriguez then sent defendant
20 MCKIBBEN two photos of handwritten lists documenting 36 orders for
21 cocaine and M30 pills.

22 Overt Act No. 40: On September 7, 2021, in text messages,
23 defendant MCKIBBEN gave Co-Conspirator Rodriguez an update about the
24 status of packaging drugs, stating, "[f]irst list is done."

25 Overt Act No. 41: On September 7, 2021, in encrypted messages
26 sent through Telegram Messenger, defendant RUSHON informed Co-
27 Conspirator Rodriguez "all the coke is done," and that "christian
28 [i.e., defendant MCKIBBEN] is doing the other shit."

1 Overt Act No. 42: On September 7, 2021, in response to the
2 electronic messages referenced in Overt Act No. 41, Co-Conspirator
3 Rodriguez asked defendant RUSHTON "how many boats are left" and told
4 defendant RUSHTON to "tell soto to come get boxes when he is done."

5 Overt Act No. 43: On September 7, 2021, in response to the
6 electronic messages referenced in Overt Act No. 42, defendant RUSHTON
7 told Co-Conspirator Rodriguez there were "2 boats" of drugs
8 remaining.

9 Overt Act No. 44: On September 8, 2021, in text messages
10 responding to Co-Conspirator Rodriguez asking "did you get it
11 done[?]", defendant CARTIER responded, "[y]ea," and "I had to take
12 about 10 to the one on N. Hollywood Way[] [b]ecause there was only
13 two post office[s] . . . open today."

14 Overt Act No. 45: On September 9, 2021, in encrypted messages
15 sent through Telegram Messenger, Co-Conspirator Rodriguez asked
16 defendant CARTIER "did u finish orders," to which defendant CARTIER
17 responded "[y]ea."

18 Overt Act No. 46: On September 9, 2021, in encrypted messages
19 sent through Telegram Messenger, Co-Conspirator Rodriguez sent
20 defendant MCKIBBEN a photograph of a handwritten list of 36 orders
21 for cocaine and M30 pills.

22 Overt Act No. 47: On September 10, 2021, in text messages,
23 defendant MCKIBBEN told Co-Conspirator Rodriguez, "Imma need more
24 than a hundred a day" because he had been "bustin my ass all week."

25 Overt Act No. 48: On September 10, 2021, in text messages,
26 defendant MCKIBBEN sent Co-Conspirator Rodriguez a photograph of Co-
27 Conspirator Rodriguez's handwritten list of drug orders with the
28

1 orders crossed out, and stated, "I'm done" and that "[a]ll the orders
2 are manillaed."

3 Overt Act No. 49: On September 22, 2021, in encrypted messages
4 sent through Telegram Messenger, Co-Conspirator Rodriguez and
5 defendant MCKIBBEN exchanged photographs of a handwritten list of 46
6 orders for cocaine and M30 pills, in which they progressively crossed
7 out orders throughout the day.

8 Overt Act No. 50: On September 22, 2021, Co-Conspirator
9 McDonald or a co-conspirator sold "Oxy M30 100 Pack" on the White
10 House Market marketplace, through the vendor page SOUTHSIDEOXY, and
11 subsequently distributed pills containing fentanyl to a person whom
12 Co-Conspirator McDonald believed was a drug buyer, but who was
13 actually an undercover employee of the DEA.

14 Overt Act No. 51: On October 20, 2021, in text messages to Co-
15 Conspirator Clutario, Co-Conspirator McDonald stated "i needa give u
16 another 60k" "to tuck away."

17 Overt Act No. 52: On October 24, 2021, in encrypted messages
18 sent through Telegram Messenger, Co-Conspirator Rodriguez asked
19 defendant SOTO to "check out torrez market" "and asap market" -- both
20 dark web marketplaces -- and "tell me which one u got a stronger
21 feeling on."

22 Overt Act No. 53: On October 24, 2021, in response to the text
23 messages referenced in Overt Act No. 52, defendant SOTO stated, "I
24 feel like Torrez is better" and that "versus" -- a third dark web
25 marketplace -- was also "good for us to sell anything but 30's"
26 because "they have a strong no fent policy."

27 Overt Act No. 54: On November 4, 2021, in text messages, Co-
28 Conspirator McDonald informed Co-Conspirator Rodriguez that he was

1 going to attempt to find customers at hotels in "hollywood & la" and
2 "move hella bricks" of drugs.

3 Overt Act No. 55: On November 19, 2021, in text messages, Co-
4 Conspirator McDonald informed Co-Conspirator Clutario that Co-
5 Conspirator McDonald needed to purchase "long jackets" to "hide my
6 gun." Co-Conspirator McDonald explained that "i'm rllly not tryna go
7 out without [my gun]," because there was "too much shit going on."
8 Co-Conspirator McDonald emphasized that he was a "REAL DRUG DEALER
9 BABY" who could "get anything anywhere."

10 Overt Act No. 56: On December 6, 2021, Co-Conspirator McDonald
11 or a co-conspirator sold "(250) M30 Super Smackers" on the ToRReZ
12 marketplace, through the vendor page REALSOUTHSIDEOXY, and
13 subsequently distributed pills containing fentanyl to a person whom
14 Co-Conspirator McDonald believed was a drug buyer, but who was
15 actually an undercover employee of the DEA.

16 Overt Act No. 57: On December 8, 2021, in text messages to Co-
17 Conspirator Clutario, Co-Conspirator McDonald stated that he was
18 going to "go get another phone" "to use for all my shi" "and kinda yk
19 clean my shi out" because "this just not secure." Co-Conspirator
20 McDonald further expressed that he "not use icloud or that shit," and
21 would use a "fake email."

22 Overt Act No. 58: On December 27, 2021, Co-Conspirator
23 McDonald packaged drug orders in his apartment located in Van Nuys,
24 California.

25 Overt Act No. 59: On February 3, 2022, Co-Conspirator McDonald
26 or a co-conspirator sold "M30 Super Smackers 50 Pack" on the Dark0de
27 marketplace, through the vendor page SOUTHSIDEOXY, and subsequently
28 distributed pills containing fentanyl to a person whom the co-

1 conspirator believed was a drug buyer, but who was actually an
2 undercover employee of the Federal Bureau of Investigation ("FBI").

3 Overt Act No. 60: On February 9, 2022, Co-Conspirator McDonald
4 created a digital image stating "need workers for 6h paying 100-150\$
5 depending on what i hear back from your work gig can be 12mo every
6 friday saturday & sunday[,] need 6 ppl."

7 Overt Act No. 61: On February 16, 2022, Co-Conspirator
8 McDonald or a co-conspirator sold "M30 Super Smackers 50 Pack" on the
9 Dark0de marketplace, through the vendor page SOUTHSIDEOXY, and
10 subsequently distributed pills containing fentanyl to a person whom
11 the co-conspirator believed was a drug buyer, but who was actually an
12 undercover employee of the FBI.

13 Overt Act No. 62: On February 23, 2022, Co-Conspirator
14 McDonald catalogued materials relating to the drug trafficking
15 conspiracy, including four firearms, four boxes of ammunition, large
16 amounts of currency, and a bowl of blue pills consistent with
17 counterfeit oxycodone pills.

18 Overt Act No. 63: On February 24, 2022, in text messages to
19 Co-Conspirator Clutario, Co-Conspirator McDonald noted that a darknet
20 marketplace had been taken down, stating that "the shit fucking
21 closed" and "all my money on there gone."

22 Overt Act No. 64: On April 7, 2022, Co-Conspirator McDonald or
23 a co-conspirator caused approximately 50 pills containing fentanyl to
24 be shipped to a drug customer who had purchased the pills from the
25 dark web vendor account JEFEDEMICHOACAN, operating on the dark web
26 marketplace AlphaBay Market.

27 Overt Act No. 65: On April 4, 2022, Co-Conspirator McDonald or
28 a co-conspirator caused approximately 764 pills containing fentanyl

1 to be shipped to a drug customer who had purchased the pills from the
2 dark web vendor account JEFEDEMICHOACAN, operating on the dark web
3 marketplace AlphaBay Market.

4 Overt Act No. 66: On May 13, 2022, Co-Conspirator McDonald or
5 a co-conspirator caused approximately 50 pills containing fentanyl to
6 be shipped to a drug customer who had purchased the pills from the
7 dark web vendor account JEFEDEMICHOACAN, operating on the dark web
8 marketplace AlphaBay Market.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

On or about August 17, 2021, in Los Angeles County, within the Central District of California, defendants ALEJANDRO SOTO, AUSTIN BLACANO, JOHN CARTIER, CHRISTIAN MCKIBBEN, and CRAIG RUSHTON, each aiding and abetting the others, knowingly and intentionally distributed N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

On or about August 17, 2021, in Los Angeles County, within the Central District of California, defendants ALEJANDRO SOTO, AUSTIN BLACANO, JOHN CARTIER, CHRISTIAN MCKIBBEN, and CRAIG RUSHTON, each aiding and abetting the others, knowingly and intentionally distributed cocaine, a Schedule II narcotic drug controlled substance.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

On or about September 22, 2021, in Los Angeles County, within the Central District of California, defendants ALEJANDRO SOTO, AUSTIN BLACANO, JOHN CARTIER, CHRISTIAN MCKIBBEN, and CRAIG RUSHTON, each aiding and abetting the others, knowingly and intentionally distributed N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

A TRUE BILL

/s/

Foreperson

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